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BY ECF

The Honorable Stephanie A. Gallagher
United States District Judge
United States District Court, District of Maryland
101 West Lombard Street, Chambers 7C
Baltimore, MD 21201

Re: **State of Maryland v. Exxon Mobil, et al., Case No. 1:18-cv-00459-SAG**
Defendants' Rule 30(b)(6) Notice of Deposition to Plaintiff on the Focus Sites

Dear Judge Gallagher:

The parties write to apprise the Court of their agreement regarding Defendants' Rule 30(b)(6) Notice of Deposition to Plaintiff on the Focus Sites, and specifically Plaintiff's production of documents and preparation of its Rule 30(b)(6) witnesses with respect to topics implicating the "vicinity" of each Focus Site. The agreement is memorialized in the attached proposed CMO for the Court's review and approval. We are available to discuss this agreement with the Court if it would be helpful.

Respectfully submitted,

/s/ James A. Pardo

James A. Pardo
McDermott Will & Emery LLP

*Counsel for Exxon Mobil Corporation
and on behalf of all Defendants of Record*

cc: All Counsel of Record by ECF

Respectfully submitted,

/s/ Yechiel M. Twersky

Yechiel M. Twersky
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